# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**JAMES SHELTON** 

Case No. 2:18-cv-02187-CFK

Hon. CHAD F. KENNEY

Plaintiff,

 $\mathbf{V}$ 

**ARETE FINANCIAL GROUP et al** 

Defendant.

REO LAW, LLC

By: Bryan Anthony Reo

P.O. Box 5100 Mentor, OH 44061

(Business): (216) 505-0811 (Mobile): (440) 313-5893 (E): Reo@ReoLaw.org *Attorney for James Shelton* 

# APPLICATION FOR ENTRY OF DEFAULT AGAINST DEFENDANTS

To the Clerk of the United States District Court for the Eastern District of Pennsylvania:

In accordance with Rule 55 of the Federal Rules of Civil Procedure, Plaintiff James Shelton, by and through the undersigned attorney, respectfully requests that the Clerk enter Default against the following Defendants for failure to plead or otherwise defendant against this civil action in a timely manner:

Name of Defendant: Arete Financial Group, LLC.

- 1. As evidenced by Docket Entry No. 21 on file with this Court, Arete Financial Group, was ordered to file an Answer on or by 12/4/2018.
  - 2. Defendants have failed to move or plead as of 12/10/2018.
  - 3. Defendants should therefore be placed in a state of default.
- 4. The time for Defendant Arete Financial Group to file its first responsive pleading expired on December 4, 2018.

#### Name of Defendant: Shunmin Hsu.

- 1. As evidenced by Docket Entry No. 21 on file with this Court, Shunmin Hsu, was ordered to file an Answer on or by 12/4/2018.
  - 2. Defendants have failed to move or plead as of 12/10/2018.
  - 3. Defendants should therefore be placed in a state of default.
- 4. The time for Defendant Shunmin Hsu to file his first responsive pleading expired on December 4, 2018.

#### Name of Defendant: Phu Loc.

- 1. As evidenced by Docket Entry No. 21 on file with this Court, Phu Loc, was ordered to file an Answer on or by 12/4/2018.
  - 2. Defendants have failed to move or plead as of 12/10/2018.
  - 3. Defendants should therefore be placed in a state of default.
- 4. The time for Defendant Phu Loc to file his first responsive pleading expired on December 4, 2018.

The clerk is therefore requested to record an entry of default as to each Defendant.

### RESPECTFULLY SUBMITTED,

#### /s/ BRYAN ANTHONY REO\_\_\_

## **REO LAW LLC**

By: Bryan Anthony Reo (#0097470)

P.O. Box 5100 Mentor, OH 44061

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Attorney for Plaintiff James Shelton

# **Certificate of Service**

I, Bryan Anthony Reo, do hereby certify and affirm that a true and accurate copy of the foregoing document was submitted to the Court's Electronic Filing System on December 10, 2018, which should serve said document upon all attorneys of record for the instant civil action:

## /s/ BRYAN ANTHONY REO\_

#### **REO LAW LLC**

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